

EXHIBIT A

DECLARATORY JUDGMENT ACTION

1. This is an action for a declaratory judgment brought pursuant to the New Jersey Declaratory Judgment Act, N.J.S.A. 2A:16-50, et seq. Sun Chemical seeks a determination as to the availability of insurance coverage for environmental claims arising out of and in connection with the Passaic River (defined below); the Berry's Creek Study Area (defined below); litigation captioned Sequa Corporation, Plaintiff v. Sun Chemical Corporation, Defendant/Third-Party Plaintiff v. Fleshment, LLC and Glenn P. Bruhardt, Third-Party Defendants, Docket No. MRS-L-2166-17 ("Sequa Litigation"); litigation captioned Occidental Chemical Corporation v. 21st

Century Fox America, Inc., et al., Docket No. 2:18-cv-11273-JLL/JAD (“Occidental Litigation”); a confidential mediation involving numerous entities, including Sun Chemical with regard to the Lower Passaic River (“Confidential Alter Echo Mediation”); and a confidential mediation involving numerous entities with regard to the Berry’s Creek Study Area (“Confidential FTI Mediation”), the foregoing of which include claims which have been asserted both by private parties and governmental authorities (collectively, the “Environmental Claims”).

THE PARTIES

2. Plaintiff, Sun Chemical, is a Delaware corporation which has its principal place of business at 35 Waterview Boulevard, Parsippany, New Jersey 07054.

3. Defendant, American International Group, Inc. (“AIG”), is a Delaware corporation, which has its principal place of business at 175 Water Street, New York, New York 10038, and is licensed to do business in New Jersey, and is doing and transacting business in New Jersey. AIG, through its authorized representative, is handling these claims for each of its member companies listed in paragraphs 4 through 6 below.

4. Defendant, American Home Assurance Company (“American Home”), is a New York corporation with its principal place of business at 175 Water Street, New York, New York 10038, and is licensed to do business in New Jersey, and is doing and transacting business in New Jersey. American Home is a member of AIG.

5. Defendant, National Union Fire Insurance Company of Pittsburgh, PA (“National Union”), is a Pennsylvania corporation with its principal place of business at 175 Water Street, New York, New York 10038, and is licensed to do business in New Jersey, and is doing and transacting business in New Jersey. National Union is a member of AIG.

6. Defendant, Landmark Insurance Company (“Landmark”), is a Pennsylvania corporation with its principal place of business at 175 Water Street, New York, New York 10038, and is licensed to do business in New Jersey, and is doing and transacting business in New Jersey. Landmark is a member of AIG.

7. AIG, American Home, National Union and Landmark will be referred to hereafter as the “AIG Companies.” The policies set forth in paragraphs 14-17 shall be referred to collectively hereafter as the “Policies.”

JURISDICTION AND VENUE

8. The jurisdiction of this Court is invoked pursuant to the New Jersey Declaratory Judgment Act, N.J.S.A. 2A:16-50, et seq.

9. This Court has jurisdiction over the AIG Companies because, upon information and belief, the AIG Companies are:

- a. Licensed or authorized to do business in New Jersey; or
- b. have, within the relevant time period, engaged in the business of selling insurance in New Jersey.

10. Venue is proper in this county pursuant to R. 4:3-2 because the events which resulted in certain of the Environmental Claims (defined above) against Sun Chemical allegedly took place within this county.

FACTUAL BACKGROUND

11. On December 31, 1986, Sun Chemical, pursuant to a written contract, the Asset Purchase Agreement (“APA”), acquired certain assets of the inks and pigments business previously operated by an entity now known as Sequa Corporation.

The Sun Chemical Sites in Issue

12. In connection with that acquisition, Sun Chemical continued certain inks and pigments operations at the following locations which Sequa had previously operated and had either owned or leased:

185 Foundry Street, Newark, New Jersey.

631 Central Avenue, Carlstadt, New Jersey.

390 Central Avenue, East Rutherford, New Jersey.

397 Central Avenue, Carlstadt, New Jersey; and

500 Industrial Avenue, Teterboro, New Jersey.

13. Sun Chemical acquired businesses at the following two additional locations which are implicated in connection with certain of the Environmental Claims:

343 Murray Hill Parkway, East Rutherford, New Jersey, and

180 East Union Avenue, East Rutherford New Jersey.

The Sun Chemical Policies in Issue

14. On December 31, 1986, American Home issued a general liability policy to Sun/DIC Acquisition Corporation, which is the entity that acquired certain inks and pigment assets from Sequa and subsequently changed its name to Sun Chemical Corporation. The American Home policy bearing policy number GLA 1980568 had an inception date of December 31, 1986 and a termination date of August 15, 1987. That policy contained a “sudden and accidental” pollution exclusion and provided coverage not only for “property damage,” but also, by endorsement, “contractual liability coverage” for all written contracts. The “sudden and accidental” pollution exclusion does not operate to bar coverage for any of the Environmental

Claims. The per occurrence and aggregate limits for both property damage and contractual liability coverage are one million dollars (\$1,000,000).

15. On December 31, 1986, National Union issued a general liability policy to Sun/DIC Acquisition Corporation, which is the entity that acquired certain inks and pigment assets from Sequa and subsequently changed its name to Sun Chemical Corporation. That policy bearing policy number GLA 1980567 had an inception date of December 31, 1986 and a termination date of August 15, 1987. The policy contained a “sudden and accidental” pollution exclusion and provided coverage not only for “property damage,” but also, by endorsement, “contractual liability coverage” for all written contracts. The “sudden and accidental” pollution exclusion does not operate to bar coverage for any of the Environmental Claims. The per occurrence and aggregate limits for both property damage and contractual liability coverage are one million dollars (\$1,000,000).

16. On August 15, 1987, National Union issued a general liability policy to Sun. That policy bearing policy number GLA 430 0984 had an inception date of August 15, 1987 and a termination date of August 15, 1988. That policy contained a “sudden and accidental” pollution exclusion and provided coverage not only for “property damage,” but also, by endorsement, “contractual liability coverage” for all written contracts. The “sudden and accidental” pollution exclusion does not operate to bar coverage for any of the Environmental Claims. The combined single limit for both property damage and contractual liability coverage is one million dollars (\$1,000,000).

17. On December 31, 1986, Landmark issued an umbrella liability policy to Sun/DIC Acquisition Corporation, which is the entity that acquired certain inks and pigment assets from Sequa and subsequently changed its name to Sun Chemical Corporation. That policy bearing

number UMB 600-23-79 had an inception date of December 31, 1986 and a termination date of December 31, 1987. That policy contained a “sudden and accidental” pollution exclusion and provided coverage not only for “property damage,” but also “liability assumed by the Insured under contract because of ‘property damage’ ... as defined herein caused by an occurrence.” Endorsement #4 entitled “Pollution Endorsement” does not operate to bar coverage for any of the Environmental Claims. The per occurrence and aggregate limits for both property damage and contractual liability coverage are five million dollars (\$5,000,000).

18. Upon information and belief, no policy limits in any of the policies set forth in paragraphs 14-16 of this Complaint have been exhausted.

The Passaic River Claim

19. In 1996, Sun Chemical received an information request from the United States Environmental Protection Agency (“EPA”) pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (“CERCLA”), 42 U.S.C. § 9604 (e) in connection with the Passaic River. Sun Chemical responded to this information request.

20. In 2006, Sun Chemical received a General Notice Letter from the EPA alleging that Sun Chemical and certain other potentially responsible parties (“PRPs”) have CERCLA liability exposure in connection with the Passaic River. The alleged nexus between Sun Chemical and the Passaic River are post-1986 operations at the 185 Foundry Street, Newark, New Jersey site involving the alleged off-site disposal of contaminants through the collection, transportation and disposal systems owned and operated by third parties.

21. At no time has Sun Chemical “owned controlled or occupied” any portion of the Passaic River or any of its tributaries.

22. While denying any and all liability associated with the contamination of the Passaic River and preserving all of its rights and defenses, Sun Chemical has been cooperating with the EPA and other PRPs in connection with investigations and studies necessary to determine the scope and extent of the contamination and the appropriate means to remediate it.

23. The AIG Companies have an obligation to defend and indemnify Sun Chemical under the Policies with regard to the Passaic River Claim and to reimburse Sun Chemical for amounts expended in connection with the Passaic River Claim.

Berry's Creek Study Area ("BCSA") Claim

24. In 2002, Sun Chemical received a CERCLA 9604(e) information request relating to the BCSA to which Sun Chemical responded.

25. In March 2006, Sun Chemical received a General Notice Letter from the EPA alleging that Sun Chemical and certain other PRPs have CERCLA liability exposure in connection with the BCSA. The alleged nexus between Sun Chemical and BCSA involves the alleged off-site disposal of contaminants through collection, transportation and disposal systems owned and operated by third parties.

26. At no time has Sun Chemical "owned controlled or occupied" any portion of Berry's Creek or any of its tributaries.

27. While denying any and all liability associated therewith and preserving all of its rights and defenses, Sun Chemical has been cooperating with the EPA and other PRPs in connection with investigations and studies necessary to determine the scope and extent of the contamination and the appropriate means to remediate the BCSA.

28. The AIG Companies have an obligation to defend and indemnify Sun Chemical under the Policies with regard to the BCSA Claim and to reimburse Sun Chemical for amounts expended in connection with the BCSA.

The Sequa Litigation

29. In October 2017, Sequa filed suit against Sun Chemical. The complaint alleges that, pursuant to the terms of the APA, under which certain inks and pigment assets were sold to Sun Chemical, Sun Chemical is obligated to indemnify, defend, and hold harmless Sequa for certain claims as set forth in that complaint.

30. More specifically, Sequa alleges that, to the extent any discharges of contaminants from the Business Site known as 185 Foundry Street, Newark, New Jersey resulted in contamination to the Passaic River (as alleged by the EPA), Sun Chemical has assumed that liability for Sequa's as well as Sun Chemical's operational history at 185 Foundry Street pursuant to the APA. Sequa further alleges that Sun Chemical has the contractual obligation under the APA to address and pay for the investigation and remediation of that contamination on a going forward basis. Sequa also seeks to recoup from Sun Chemical more than \$7.5 million in alleged past costs incurred by Sequa in connection with the Passaic River Claim based upon certain indemnification provisions in the APA.

31. Sun Chemical has denied that it assumed any such liability or has any such indemnification obligations pursuant to the APA.

32. While denying Sequa's allegations, Sun Chemical avers that the AIG Companies have an obligation to defend and indemnify Sun Chemical under the Policies with regard to the Sequa Litigation and to reimburse Sun Chemical for amounts expended in connection with the Sequa Litigation.

Occidental Litigation

33. In July 2018, Occidental Chemical Corporation (“Occidental”) filed a complaint in the Federal District Court of New Jersey against numerous defendants, including Sun Chemical, for contribution and cost recovery pursuant to CERCLA §§ 9113 and 9107 in connection with the costs Occidental has and will incur in connection with the investigation and remediation of the Passaic River.

34. While denying any liability to Occidental under CERCLA §§ 9113 and 9107, Sun Chemical avers that the AIG Companies have an obligation under the Policies to defend and indemnify Sun Chemical with regard to the Occidental Litigation and to reimburse Sun Chemical for amounts expended in connection with the Occidental Litigation.

Confidential Alter Echo Allocation Process (Passaic River Claim)

35. In September 2017, EPA offered 82 General Notice Letter recipients, including Sun Chemical, an opportunity to participate in an allocation process to determine relative shares of responsibility for the Lower Eight Miles of the Passaic River Claim. EPA chose the allocator, David Batson of Alter Echo, and agreed to fund the allocation effort. Most of these 82 companies, including Sun Chemical, but excluding Occidental, have agreed to participate in this process, which is ongoing.

36. While denying any liability in connection with the Passaic River Claim, Sun Chemical avers that the AIG Companies have an obligation under the Policies to defend and indemnify Sun Chemical with regard to the Confidential Alter Echo Allocation Process and to reimburse Sun Chemical for amounts expended in connection with Confidential Alter Echo Allocation Process (Passaic River Claim).

Confidential FTI Allocation Process (BCSA Claim)

37. In 2002, Sun Chemical received a CERCLA § 9604(e) information request relating to the BCSA. In March 2006, Sun Chemical received a General Notice letter from the EPA advising it of its potential liability under CERCLA with respect to the BCSA.

38. Three of the Sun Chemical sites implicated by the EPA in connection with the BCSA were “Business Sites,” a defined term in the APA, transferred from Sequa to Sun Chemical pursuant to the terms of the APA on December 31, 1986. These properties include 390 Central Avenue, East Rutherford, New Jersey; 500 Industrial Avenue, Teterboro, New Jersey; and 631 Central Avenue, Carlstadt, New Jersey.

39. In addition, on December 31, 1986, Sun Chemical entered into a reciprocal lease agreement and later a lease agreement with Sequa relating to a site located at 397 Central Avenue, East Rutherford, New Jersey. The 397 Central Avenue Site is also implicated by the EPA in connection with the BCSA.

40. In addition to the foregoing, companies later acquired by Sun Chemical also operated the following Sites during the time periods when the Policies were in effect, both of which are part of the BCSA allocation: 343 Murray Hill Parkway, East Rutherford, New Jersey and 180 East Union Avenue, East Rutherford, New Jersey.

41. Sun Chemical is a party to a final confidential allocation process regarding the BCSA being undertaken by FTI, which is slated for completion in 2020.

42. While denying any liability in connection with the BCSA claim, Sun Chemical avers that the AIG Companies have an obligation to defend and indemnify Sun Chemical under the Policies with regard to the Confidential FTI Allocation Process and to reimburse Sun Chemical for amounts expended in connection with that Allocation Process.

Demand for Coverage and Response from AIG Companies

43. On May 24, 2019, Sun Chemical placed the AIG Companies on notice of the Environmental Claims seeking defense and indemnity pursuant to certain of the Policies.

44. AIG acknowledged receipt of the notice by letter dated June 14, 2019.

45. Subsequently, on July 12, 2019, AIG offered a defense under American Home Policy GLA 1980568 and National Union Policy 1980567 for a subset of the Environmental Claims pursuant to a reservation of rights, which included AIG's purported "right" to recoup defense costs from Sun Chemical if it is determined that there is no indemnification obligation. Specifically, AIG stated as follows: "We reserve the right to terminate our participation in the defense should subsequent investigation indicate a reason for doing so, and to seek recoupment of defense costs paid should investigation reveal that there is no coverage." [Emphasis added].

46. No such right of reimbursement appears in any of the Policies.

47. Sun Chemical did not accept AIG's proffer of a defense pursuant to this reservation of rights under any of the Policies.

48. On September 9, 2019, AIG denied defense and indemnity for the Sequa Litigation pursuant to the American Home and National Union policies in effect from December 31, 1986 to August 15, 1987, primarily on the basis of the contractual liability exclusion. This exclusion is inapplicable due to the operation of the contractual liability endorsement which appears on both of these policies, as well as the subsequent policy issued by National Union from August 15, 1987 until August 15, 1988.

49. While AIG has never specifically addressed the National Union policy in effect from August 15, 1987 to August 15, 1988 in any of its correspondence, its terms are, in all

material respects, identical with the National Union policy in effect between December 31, 1986 and August 15, 1987.

50. On February 10, 2020, AIG denied defense and indemnity for all Environmental Claims pursuant to the Landmark Policy, primarily on the basis of the purported applicability of endorsement 4 entitled “Pollution Endorsement.”

51. Over the past several months, Sun Chemical and AIG have engaged in discussions concerning the coverage provided for Environmental Claims under all of the Policies, but with no resolution.

52. Sun Chemical seeks a declaratory judgment that the terms of the Policies obligate the AIG Companies to defend and indemnify Sun Chemical in connection with all of the Environmental Claims and to reimburse Sun Chemical for amounts expended in connection with all of the Environmental Claims.

COUNT AGAINST AIG

53. Sun Chemical repeats and realleges the allegations of Paragraphs 1 through 52 of the Complaint as though set forth below in their entirety.

54. Each of the Environmental Claims concerns “property damage” caused by an “occurrence” as defined by the Policies and is covered under the Policies.

55. None of the pollution exclusions found in any of the Policies bars coverage.

56. No other exclusions found on any of the Policies bar coverage.

57. The Policies expressly provide contractual liability coverage for the claims arising in the Sequa Litigation.

WHEREFORE, Sun Chemical requests a judgment against the AIG Companies as follows:

A. Declaring that, pursuant to the terms of the Policies, the AIG Companies are obligated to defend and indemnify Sun Chemical in connection with the Environmental Claims and to reimburse Sun Chemical for amounts expended in connection therewith.

B. For reasonable attorneys' fees and the costs and disbursements of this action to the extent provided by R. 4:42-8 and R. 4:42-9(a)(6), including interest; and

C. For such other and further relief as this Court may deem just and proper, including applicable interest.

REQUEST FOR A JURY TRIAL

Sun Chemical requests a trial by jury as to all issues so triable.

DESIGNATION OF TRIAL COUNSEL

Sun Chemical hereby designates Martha N. Donovan, Esq. as its trial counsel.

Norris McLaughlin, P.A.
Attorneys for Plaintiff,
Sun Chemical Corporation


By: 
Martha N. Donovan

Dated: April 14, 2020

CERTIFICATION PURSUANT TO RULE 4:5-1

Upon information and belief, the matter in controversy is not the subject of any other action pending in any court, other than the Sequa Litigation and the Occidental Litigation (defined above) which do not involve any insurance related matters, or of a pending arbitration proceeding and no other action or arbitration proceeding is contemplated. At this time, Sun Chemical knows of no additional parties which should be added to this action.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Martha N. Donovan

Dated: April 14, 2020

Civil Case Information Statement

Case Details: ESSEX | Civil Part Docket# L-002674-20

Case Caption: SUN CHEMICAL CORPORA TION VS
AMERICAN INTERNATIO

Case Initiation Date: 04/14/2020

Attorney Name: MARTHA NASE DONOVAN

Firm Name: NORRIS MC LAUGHLIN PA

Address: 400 CROSSING BLVD 8TH FL PO BOX 5933
BRIDGEWATER NJ 08807

Phone: 9087220700

Name of Party: PLAINTIFF : SUN CHEMICAL
CORPORATION

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: ENVIRONMENTAL/ENVIRONMENTAL COVERAGE
LITIGATION

Document Type: Complaint

Jury Demand: NONE

Is this a professional malpractice case? NO

Related cases pending: YES

If yes, list docket numbers: Docket No. MRS-L-2166-17 and DNJ
Case No. 2:18-11273

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Other(explain) Insured/Insurer

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

04/14/2020
Dated

/s/ MARTHA NASE DONOVAN
Signed

EXHIBIT B

Norris McLaughlin, P.A.
Martha N. Donovan, Esq. (021761985)
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(908) 722-0700
Direct: (908)252-4240
Email: mndonovan@norris-law.com
Attorneys for Plaintiff, Sun Chemical Corporation

SUN CHEMICAL CORPORATION,

Plaintiff,

v.

AMERICAN INTERNATIONAL
GROUP, INC.; AMERICAN HOME
INSURANCE; NATIONAL UNION
FIRE INSURANCE COMPANY OF
PITTSBURGH, PA; and LANDMARK
INSURANCE COMPANY,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - ESSEX COUNTY

Docket No. ESX-L-2674-20

SUMMONS

From The State of New Jersey
To The Defendants Named Above: **American Home Assurance Company**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/pro se/10153_deptyclerklawref.pdf

Dated: April 20, 2020

/s/ Michelle M. Smith

MICHELLE M. SMITH

Clerk of the Superior Court

Name of Defendants to be Served:

Address of Defendants to be Served:

American Home Assurance Company

c/o Office of Regulatory Affairs

**New Jersey Department of Banking and
Insurance**

20 West State Street

PO Box 325

Trenton, New Jersey 08625-0325

ATLANTIC COUNTY

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401
LAWYER REFERRAL (609) 345-3444
LEGAL SERVICES (609) 348-4200

BERGEN COUNTY

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main Street
Hackensack, NJ 07601-0769
LAWYER REFERRAL (201) 488-0044
LEGAL SERVICES (201) 487-2166

BURLINGTON COUNTY

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Floor, Courts Facility
49 Rancocas Rd.
Mount Holly, NJ 08060
LAWYER REFERRAL (609) 261-4862
LEGAL SERVICES (609) 261-1088

CAMDEN COUNTY

Deputy Clerk of the Superior Court
Civil Processing Office
1st Fl., Hall of Records
101 S. Fifth Street
Camden, NJ 08103
LAWYER REFERRAL (856) 482-0618
LEGAL SERVICES (856) 964-2010

CAPE MAY COUNTY

Deputy Clerk of the Superior Court
Central Processing Office
9. N. Main Street
Box DN-209
Cape May County Court House, NJ 08210
LAWYER REFERRAL (609) 463-0313
LEGAL SERVICES (609) 465-3001

CUMBERLAND COUNTY

Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad Street
P.O. Box 10
Bridgeton, NJ 08302
LAWYER REFERRAL (856) 696-5550
LEGAL SERVICES (856) 691-0494

ESSEX COUNTY

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102
LAWYER REFERRAL (973) 622-6204
LEGAL SERVICES (973) 624-4500

GLOUCESTER COUNTY

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Fl., Court House
1 North Broad Street, P. O. Box 129
Woodbury, NJ 08096
LAWYER REFERRAL (856) 848-4589
LEGAL SERVICES (856) 848-5360

HUDSON COUNTY

Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House - 1st Floor
583 Newark Avenue
Jersey City, NJ 07306
LAWYER REFERRAL (201) 798-2727
LEGAL SERVICES (201) 792-6363

HUNTERDON COUNTY

Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08862
LAWYER REFERRAL (908) 236-6109
LEGAL SERVICES (908) 782-7979

MERCER COUNTY

Deputy Clerk of the Superior Court
Local Filing Office, Court House
175 S. Broad Street, P. O. Box 8068
Trenton, NJ 08650
LAWYER REFERRAL (609) 585-6200
LEGAL SERVICES (609) 695-6249

MIDDLESEX COUNTY

Deputy Clerk of the Superior Court
Middlesex Vicinage
2nd Floor - Tower
56 Paterson St., PO Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL (732) 828-0053
LEGAL SERVICES (732) 246-7600

MONMOUTH COUNTY

Deputy Clerk of the Superior Court
Court House
P.O. Box 1269
Freehold, NJ 07728-1262
LAWYER REFERRAL (732) 431-5544
LEGAL SERVICES (732) 866-0020

MORRIS COUNTY

Deputy Clerk of the Superior Court
Civil Division
Washington & Court Streets
PO Box 910
Morristown, NJ 07960-0910
LAWYER REFERRAL (973) 267-5882
LEGAL SERVICES (973) 285-6911

OCEAN COUNTY

Deputy Clerk of the Superior Court
Court House, Room 121
118 Washington Street
Toms River, NJ 08754
LAWYER REFERRAL (732) 240-3666
LEGAL SERVICES (732) 341-2727

PASSAIC COUNTY

Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL (973) 278-9223
LEGAL SERVICES (973) 523-2900

SALEM COUNTY

Deputy Clerk of the Superior Court
92 Market Street
Salem, NJ 08079
LAWYER REFERRAL (856) 935-5629
LEGAL SERVICES (856) 691-0494

SOMERSET COUNTY

Deputy Clerk of the Superior Court
Civil Division Office
P. O. Box 3000
40 N. Bridge Street
Somerville, NJ 08876
LAWYER REFERRAL (908) 685-2323
LEGAL SERVICES (908) 231-0840

SUSSEX COUNTY

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL (973) 267-5882
LEGAL SERVICES (973) 383-7400

UNION COUNTY

Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073
LAWYER REFERRAL (908) 353-4715
LEGAL SERVICES (908) 354-4340

WARREN COUNTY

Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07825-1500
LAWYER REFERRAL (908) 859-4300
LEGAL SERVICES (908) 475-2010

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SUN CHEMICAL CORPORATION,

Plaintiff,

v.

AMERICAN INTERNATIONAL
GROUP, INC.; AMERICAN HOME
INSURANCE; NATIONAL UNION
FIRE INSURANCE COMPANY OF
PITTSBURGH, PA; and LANDMARK
INSURANCE COMPANY,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - ESSEX COUNTY

Docket No. ESX-L-2674-20

SUMMONS

From The State of New Jersey

To The Defendants Named Above: **National Union Fire Insurance Company of Pittsburgh, PA**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

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Dated: April 20, 2020

/s/ Michelle M. Smith

MICHELLE M. SMITH

Clerk of the Superior Court

Name of Defendants to be Served:

**National Union Fire Insurance Company of
Pittsburgh, PA**

Address of Defendants to be Served:

**c/o Office of Regulatory Affairs
New Jersey Department of Banking and
Insurance
20 West State Street
PO Box 325
Trenton, New Jersey 08625-0325**

ATLANTIC COUNTY
Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401
LAWYER REFERRAL (609) 345-3444
LEGAL SERVICES (609) 348-4200

BERGEN COUNTY
Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main Street
Hackensack, NJ 07601-0769
LAWYER REFERRAL (201) 488-0044
LEGAL SERVICES (201) 487-2166

BURLINGTON COUNTY
Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Floor, Courts Facility
49 Rancocas Rd.
Mount Holly, NJ 08060
LAWYER REFERRAL (609) 261-4862
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CAMDEN COUNTY
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LEGAL SERVICES (856) 964-2010

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Central Processing Office
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Cape May County Court House, NJ 08210
LAWYER REFERRAL (609) 463-0313
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CUMBERLAND COUNTY
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Civil Case Management Office
60 West Broad Street
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Civil Customer Service
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LEGAL SERVICES (908) 475-2010

Norris McLaughlin, P.A.
Martha N. Donovan, Esq. (021761985)
400 Crossing Blvd., 8th Floor
Bridgewater, New Jersey 08807-5933
(908) 722-0700
Direct: (908)252-4240
Email: mndonovan@norris-law.com
Attorneys for Plaintiff, Sun Chemical Corporation

SUN CHEMICAL CORPORATION,

Plaintiff,

v.

AMERICAN INTERNATIONAL
GROUP, INC.; AMERICAN HOME
INSURANCE; NATIONAL UNION
FIRE INSURANCE COMPANY OF
PITTSBURGH, PA; and LANDMARK
INSURANCE COMPANY,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - ESSEX COUNTY

Docket No. ESX-L-2674-20

SUMMONS

From The State of New Jersey
To The Defendants Named Above: Landmark Insurance Company

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

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Dated: April 20, 2020

/s/ Michelle M. Smith
MICHELLE M. SMITH
Clerk of the Superior Court

Name of Defendants to be Served:
Address of Defendants to be Served:

Landmark Insurance Company
c/o Office of Regulatory Affairs
New Jersey Department of Banking and
Insurance
20 West State Street
PO Box 325
Trenton, New Jersey 08625-0325

ATLANTIC COUNTY

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LEGAL SERVICES (908) 475-2010

EXHIBIT C

ESSEX COUNTY - CIVIL DIVISION
SUPERIOR COURT OF NJ
465 MARTIN LUTHER KING JR BLVD
NEWARK NJ 07102

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (973) 776-9300
COURT HOURS 8:30 AM - 4:30 PM

DATE: APRIL 14, 2020
RE: SUN CHEMICAL CORPORA TION VS AMERICAN INTERNATIO
DOCKET: ESX L -002674 20

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 4.

DISCOVERY IS PRESUMPTIVELY 450 DAYS BUT MAY BE ENLARGED OR SHORTENED BY THE
JUDGE AND RUNS FROM THE FIRST ANSWER OR 90 DAYS FROM SERVICE ON THE FIRST
DEFENDANT, WHICHEVER COMES FIRST.
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE MANAGING JUDGE ASSIGNED IS: HON JEFFREY B. BEACHAM

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 001
AT: (973) 776-9300.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: MARTHA N. DONOVAN
NORRIS MC LAUGHLIN PA
400 CROSSING BLVD 8TH FL
PO BOX 5933
BRIDGEWATER NJ 08807

ECOURTS

EXHIBIT D



Plaintiff
SUN CHEMICAL CORPORATION

Defendant
AMERICAN INTERNATIONAL GROUP INC., ET AL

Person to be served: AMERICAN INTERNATIONAL GROUP,
INC. C/O CORPORATION SERVICE COMPANY, REGISTERED AGENT
Address:
80 STATE STREET
ALBANY NY 12207

Attorney:
NORRIS, MCLAUGHLIN & MARCUS
400 CROSSING BLVD. 8TH FL P.O. BOX 5933
BRIDGEWATER NJ 08807

Papers Served:
SUMMONS, COMPLAINT & CASE INFORMATION STATEMENT COVER SHEET

SUPERIOR COURT OF NEW
JERSEY
LAW DIVISION:
ESSEX COUNTY

DOCKET NO. ESX-L-002674-20

AFFIDAVIT OF SERVICE
(for use by Private Service)

Cost of Service pursuant to R4:4-30

\$ _____

Service Data:

Served Successfully X Not Served _____ Date: 4/23/2020 Time: 1:50 PM Attempts: _____

_____ Delivered a copy to him/her personally

Name of Person Served and relationship/title

_____ Left a copy with a competent household
member over 14 years of age residing therein at place of abode.

JOHN Doe (name refused)
Person in charge at the
office of the registered agent

X Left a copy with a person authorized to accept
service, e.g. managing agent, registered agent, etc.

Description of Person Accepting Service:

Age: 40 Height: 6'4 Weight: 275 Hair: Red Sex: MALE Race: WHITE
BEARD

Non-Served:

- () Defendant is unknown at the address furnished by the attorney
() All reasonable inquiries suggest defendant moved to an undetermined address
() No such street in municipality
() No response on: _____ Date _____ Time _____
_____ Date _____ Time _____
_____ Date _____ Time _____

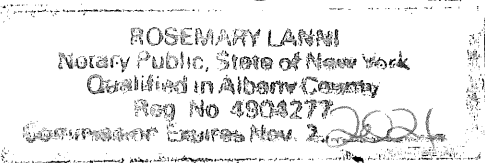
() Other: _____ Comments or Remarks _____

Subscribed and Sworn to me this
23rd day of APRIL 2020

ROBERT WEISS, was at
time of service a competent adult not having a direct
interest in the litigation. I declare under penalty
of perjury that the foregoing is true and correct.

Rosemary Lanni
Notary Signature

[Signature]
Signature of Process Server
4/23/2020
Date



DGR LEGAL, INC.
1359 Littleton Road, Morris Plains, NJ 07950-3000
(973) 403-1700 Fax (973) 403-9222

Work Order No. 499184
File No. ESX-L-002674-20

Norris McLaughlin, P.A.
Martha N. Donovan, Esq. (021761985)
400 Crossing Blvd., 8th Floor
Bridgewater, New Jersey 08807-5933
(908) 722-0700
Direct: (908)252-4240
Email: mndonovan@norris-law.com
Attorneys for Plaintiff, Sun Chemical Corporation

SUN CHEMICAL CORPORATION,

Plaintiff,

v.

AMERICAN INTERNATIONAL
GROUP, INC.; AMERICAN HOME
INSURANCE; NATIONAL UNION
FIRE INSURANCE COMPANY OF
PITTSBURGH, PA; and LANDMARK
INSURANCE COMPANY,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - ESSEX COUNTY

Docket No. ESX-L-2674-20

SUMMONS

From The State of New Jersey

To The Defendants Named Above: **American International Group, Inc.**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/pro se/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

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Dated: APRIL 15, 2020

/s/ Michelle M. Smith
MICHELLE M. SMITH
Clerk of the Superior Court

Name of Defendants to be Served: American International Group, Inc.

Address of Defendants to be Served: c/o New York Department of State
One Commerce Plaza
99 Washington Avenue
6th Floor
Albany, NY 12231

ATLANTIC COUNTY

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
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WARREN COUNTY

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EXHIBIT E



State of New Jersey
Department of Banking and Insurance
Office of the Commissioner

Phil Murphy
Governor

PO Box 325
Trenton, NJ 08625-0325

Marlene Caride
Commissioner

Sheila Oliver
Lt. Governor

Tel (609) 633-7667

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4/27/2020

Attention:
CORPORATION SERVICE COMPANY
AMERICAN HOME ASSURANCE COMPANY
PRINCETON SOUTH CORPORATE CENTER
100 CHARLES EWING BOULEVARD, SUITE 160
EWING, NJ 08628

RE: Sun Chemical Corporation v. American Home Assurance Company,
et al.
Superior Court of New Jersey, Essex County Law Division
Docket No.: ESX-L-2674-20

Dear Sir/Madam:

You are hereby notified that on this date the Commissioner of the New Jersey Department of Banking and Insurance has accepted original service of process on your behalf in the above-captioned matter. The documents served are enclosed herein.

By copy of this letter I am advising the attorney for the Plaintiff(s) in this matter that these documents have been transmitted to you, and confirming that the Commissioner of Banking and Insurance is not authorized to receive service of any further documents in this action.

Very Truly Yours,

A handwritten signature in blue ink that reads "Debra A. Mullen".

Debra A. Mullen
Administrative Assistant

C: Norris McLaughlin, P.A.
ATTN: Martha N. Donovan, Esq.
400 Crossing Boulevard, 8th Floor
Bridgewater, NJ 08807-5933





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Department of Banking and Insurance
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**CERTIFIED MAIL
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4/27/2020

Attention:
CORPORATION SERVICE COMPANY
NATIONAL UNION FIRE INSURANCE CO. OF PITTSBURGH, PA
PRINCETON SOUTH CORPORATE CENTER
100 CHARLES EWING BOULEVARD, SUITE 160
EWING, NJ 08628

RE: Sun Chemical Corporation v. National Union Fire Insurance
Company of Pittsburgh, PA, et al.
Superior Court of New Jersey, Essex County Law Division
Docket No.: ESX-L-2674-20

Dear Sir/Madam:

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NATIONAL UNION FIRE INSURANCE CO. OF PITTSBURGH, PA
PRINCETON SOUTH CORPORATE CENTER
100 CHARLES EWING BOULEVARD, SUITE 160
EWING, NJ 08628

RE: Sun Chemical Corporation v. Landmark Insurance Company N/K/A
National Union Fire Insurance Company of Pittsburgh, PA, et al.
Superior Court of New Jersey, Essex County Law Division
Docket No.: ESX-L-2674-20

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